

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

DIGGIN' YOUR DOG, LLC,

Plaintiff,

v.

THE PETLAB CO. and AMPLIFY LTD,

Defendants.

Case No. 1:21-cv-8667-JPC-RWL

**NOTICE OF MOTION FOR DEFAULT JUDGMENT AND
PERMANENT INJUNCTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Declarations in Support, and the entire record herein, Plaintiff Diggin' Your Dog, LLC hereby moves for default judgment and a permanent injunction against Defendants The Petlab Co. and Amplify Ltd, pursuant to Federal Rules of Civil Procedure 55(b)(2) and 65(d), Local Rule 55.2(b), and the Court's Individual Rule 3(d).

Dated: February 10, 2022

s/ Cameron S. Reuber

Cameron S. Reuber (CR 7001)

Peter S. Sloane (PS 7204)

Stefanie M. Garibyan (SL 6170)

LEASON ELLIS LLP

One Barker Avenue

White Plains, NY 10601

T.914.821.9077

F.914.288.0023

sloane@leasonellis.com

reuber@leasonellis.com

garibyan@leasonellis.com

lelitdocketing@leasonellis.com

Airina L. Rodrigues (AR 6551)

BROWNSTEIN HYATT FARBER SCHRECK, LLP

410 Seventeenth Street, Suite 2200

Denver, CO 80202

arodrigues@bhfs.com

Attorneys for Plaintiff Diggin' Your Dog, Inc.

CERTIFICATE OF SERVICE

It is hereby certified that on February 10, 2022, a true and correct copy of the following documents was served via ECF to all counsel of record:

- (i) **NOTICE OF MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION;**
- (ii) **MEMORANDUM IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION**
- (iii) **DECLARATION OF CAMERON S. REUBER IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION;**
- (iv) **DECLARATION OF AIRINA L. RODRIGUES IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION;**
- (v) **DECLARATION OF CHRISTY LOVE IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION; and**
- (vi) **PROPOSED ORDER GRANTING MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION.**

/s/ Cameron S. Reuber